

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BRIDGET M. CURRAN, individually, and  
as natural Guardian of C.F.C., a minor.

Civ. Action No. 13-cv-00289

Plaintiff,  
  
-against-  
  
AETNA LIFE INSURANCE COMPANY,  
TRINET GROUP, INC., and THE TRINET  
OPEN ACCESS MANAGED CHOICE PLAN,

**DECLARATION OF  
HELEN HONG  
IN SUPPORT OF  
DEFENDANTS'  
MOTION TO DISMISS**

Defendants.  
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I, HELEN HONG, being of full age, hereby certify, pursuant to 28 U.S.C. §1746(2) and FED. R. EVID. 901, as follows:

1. I am employed by TriNet Group, Inc. ("TriNet") as Corporate Counsel. In connection with my job duties in that position, I received, reviewed and responded to correspondence sent on behalf of Plaintiff to TriNet. This Declaration is based on my personal knowledge.

2. I make this Declaration to authenticate TriNet's business records in support of Defendants' Motion to Dismiss the Complaint in its entirety with prejudice.

3. True and correct copies of the following are annexed here to as Exhibit "D": (i) the letter dated March 9, 2012 with enclosures; (ii) the letter dated April 26, 2012; (iii) the letter dated May 18, 2012; (iv) the letter dated May 22, 2012; and (v) the letter July 16, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: San Leandro, CA  
May 7, 2013

  
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HELEN HONG

**CERTIFICATE OF SERVICE**

I, John T. Seybert, hereby certify and affirm that a true and correct copy of the attached **DECLARATION** was served via ECF on this 8th day of May, 2013, upon the following:

David J. Squirrell  
BANKS, CURRAN, SCHWAY & SQUIRRELL, LLP  
61 Smith Avenue  
Mount Kisco, NY 10549  
*Attorneys for Plaintiffs*

s/

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JOHN T. SEYBERT

Dated: New York, New York  
May 8, 2013